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REMARKS

Claims 1-7, 21 and 25-37 are all of the claims presently pending in the application. Claims 1, 21, 25 and 37 have been amended to more particularly define the invention and claims 5 and 33-36 have merely been editorially amended, and have not been substantively amended to more particularly define the invention.

Entry of this Amendment is believed proper since no new issues are being presented to the Examiner, which would require further consideration and/or search.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 34-36 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Claims 1-7, 21 and 25-37 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Porter (U.S. Patent No. 6,473,892). These rejections are respectfully traversed in the following discussion.

I.   THE CLAIMED INVENTION

The claimed invention of exemplary claim 1 provides a method of linking domain knowledge to document knowledge that includes rendering document knowledge as textual components with variable fields, building an object-oriented domain model including domain knowledge, wherein the building an object-oriented domain model comprises organizing data input by a user into the domain model (e.g., see Application at page 4, line 17 through page 5, line 2). This provides a dynamic document-to-domain linkage that allows different domain knowledge elements to be dynamically manipulated during the interactive configuration of a document (see Application at page 5, lines 13-15). This allows the user to edit text as the user would in a regular word processor while maintaining constant and dynamic access to information provided by the document system (see Application at page 6, lines 11-13).

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II.   THE 35 U.S.C. 112, SECOND PARAGRAPH, REJECTION

The Examiner has rejected claims 34-36 under 35 U.S.C. 112, second paragraph, as being indefinite. Specifically, the Examiner alleges that the phrase "wherein if the ORAL expression" in claims 34-36 is indefinite because it is unclear to which oral expression the limitation refers.

Applicants have amended the claims to overcome the Examiner's rejection. That is, Applicants have amended claims 34-36 to recite, inter alia, "wherein if said ORAL expression" as suggested by the Examiner.

Therefore, in view of the amendments to claims 34-36, the Examiner is respectfully requested to reconsider and withdraw this rejection.

III.   THE PRIOR ART REFERENCE

The Examiner alleges that Porter teaches the claimed invention of claims 1-7, 21 and 25-37. Applicants submit, however, that there are elements of the claimed invention, which are neither taught nor suggested by Porter.

That is, Porter does not teach or suggest *"building an object-oriented domain model comprises domain knowledge, wherein said building an object-oriented domain model comprises organizing data input by a user into said domain model"* as recited in independent claim 1, and as similarly recited in independent claims 21, 25 and 37.

The Examiner attempts to rely on Figures 1-10 and column 1, line 1 through column 20, line 34 of Porter to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere in this passage nor these figures (nor anywhere else for that matter) does Porter teach or suggest <u>building an object-oriented domain model including domain knowledge, wherein building an object-oriented domain model includes organizing data input by a user into the domain model</u>. Indeed, Porter merely teaches a document assembly system similar to that described in the Description of the Related Art section of the Application (see Application at page 2, line 1 through page 4, line 6). The

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Examiner does not even allege that Porter teaches building an object-oriented domain model including organizing data input by a user into the domain model.

That is, Porter merely discloses a document assembly system that creates a document by selecting specific paragraphs of text and inserting them into a document based on a user's input (Porter at column 6, lines 51-60). The inputted data is structured in an input data object, which is consulted by an interpreter when the interpreter prepares documents and adjusts the content of the documents accordingly (Porter at column 7, lines 11-20). A plurality of form generators include source code indicating the circumstances under which the interpreter is to generate the associated document. A compiler generates a separate form object for each form generator. Each form object, when executed by the interpreter, generates a separate document (Porter at column 7, lines 28-60).

In other words, Porter automatically produces <u>one or more documents corresponding to a single, specific transaction</u> (see Porter at column 3, lines 29-31). The document assembly system of Porter determines which documents are needed for a particular transaction, determines which paragraphs should be included in each document and generates the text of each document paragraph. The document assembly system merely selects which documents and paragraphs of text from a document database should be used based on information input by the user. Similar to the conventional assembly systems discussed in the Application, <u>the data input by the user is not organized as an object model</u>.

In contrast, the claimed invention teaches <u>building an object-oriented domain model that includes domain knowledge, including organizing data input by a user</u>. The claimed invention creates a domain model that is independent from the documents being created that may be used later to create additional documents in different transactions, and is <u>not limited to being used in a single transaction</u>, as is taught by Porter.

Therefore, Applicants submit that there are elements of the claimed invention that are not taught or suggested by Porter. Therefore, the Examiner is respectfully requested to withdraw this rejection.

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III. FORMAL MATTERS AND CONCLUSION

In response to Examiner's objections, the specification and claims have been amended in a manner believed fully responsive to all points raised by the Examiner.

Regarding the Examiner's objection to claims 35 and 36, Applicants respectfully submit that the commas between the terms "expression" and "and" in line 2 of claim 35 and line 2 of claim 36 were previously deleted in the Amendment filed on January 24, 2005.

In view of the foregoing, Applicants submit that claims 1-7, 21, and 25-37, all of the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a <u>telephonic or personal interview</u>.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: _August 16, 2005_

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FACSIMILE TRANSMISSION

I hereby certify that I am filing this paper via facsimile, to Group Art Unit 2179, at (571) 273-8300, on August 16, 2005.

Respectfully Submitted,

Date: _August 16, 2005_

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